

EXHIBIT 1

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KHADIJAH TRIBBLE,

Plaintiff,

v.

CURALEAF HOLDINGS, INC.,
and MATTHEW DARIN

Defendants.

Civil Action No. 1:24-cv-12760

**DECLARATION OF MATTHEW DARIN
IN SUPPORT OF MOTION TO DISMISS**

I, Matthew Darin, declare the following to be true and correct based upon my personal knowledge and information.


1. I am over eighteen (18) years old and am competent to provide this declaration.
2. I am a resident and citizen of the state of Florida. I have never lived in Massachusetts, nor have I owned or rented any real property in Massachusetts. Likewise, I do not have a mailing address, telephone number, bank account, or personal business in Massachusetts.
3. I reside and work in Florida, and maintain an office in Florida.
4. I previously held the position of Chief Executive Officer ("CEO") of Curaleaf Holdings, Inc. ("Curaleaf").
5. I never supervised or otherwise worked with Plaintiff in Massachusetts.
6. Over the last five years, I have been to Massachusetts once or twice per year, including to visit Curaleaf's former Wakefield, MA office, to visit Curaleaf's grow facilities,

dispensaries, and research and development labs in Webster, MA, Amesbury, MA, and Newton, MA, and once attended a Curaleaf sales meeting in Newton, MA.

7. None of my visits to Massachusetts were in any way related to or concerning Plaintiff, and I did not interact with Plaintiff while in Massachusetts.
8. I had no involvement in any decisions regarding payment of Plaintiff's 2022 bonus, nor payment of the two days' wages she alleges in her Complaint that she did not receive.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on January 9, 2025.



Matthew Darin